

Marc V. Kalagian  
Attorney at Law: 4460  
Law Offices of Rohlfing & Kalagian, LLP  
211 East Ocean Boulevard, Suite 420  
Long Beach, CA 90802  
Tel.: (562)437-7006  
Fax: (562)432-2935  
E-mail rohlfig.kalagian@rksslaw.com

Attorneys for Plaintiff  
JANET S, DENMAN

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JANET S, DENMAN,	)	Case No.: 2:16-cv-00104-GMN-PAL
	)	
Plaintiff,	)	UNOPPOSED MOTION TO EXTEND
	)	TIME TO FILE MOTION FOR
vs.	)	REMAND AND/OR REVERSAL
	)	
CAROLYN W. COLVIN, Acting	)	
	)	
Commissioner of Social Security,	)	
	)	
Defendant	)	

Plaintiff Janet S. Denman ("Plaintiff") and defendant Carolyn Colvin, Acting Commissioner of Social Security ("Defendant"), through their undersigned counsel of record, hereby stipulate, subject to the approval of the Court, to extend the time for Plaintiff to file Plaintiff's Motion for Reversal and/or Remand to October 19, 2016; and that Defendant shall have 30 days or until November 18, 2016, to file her opposition, if any is forthcoming. Any reply by plaintiff will be due December 9, 2016.

An extension of time for plaintiff is needed due to a serious illness. The spouse of the associate in Counsel's firm who this matter is assigned is dealing with

1 his Spouse's terminal illness which has unexpectedly worsened in the last few  
2 weeks as noted in the prior request for more time. Counsel has been required to  
3 devout time to planning and managing the transition to end of life care for his  
4 spouse. Counsel required time to deal with this change in condition and has taken  
5 steps to secure the at home hospice level care which his spouse now requires in  
6 order to better allow him to attend to his professional obligations. Plaintiff's  
7 request to extend the briefing schedule is not opposed by defendant as indicated via  
8 email by defendant's Counsel. Counsel sincerely apologizes to the court for any  
9 inconvenience this may have had upon it or its staff.

10 DATE: September 28, 2016, Respectfully submitted,

11 ROHLFING & KALAGIAN, LLP

12 /s/ *Marc V. Kalagian*

13 BY: \_\_\_\_\_

14 Marc V. Kalagian

Attorney for plaintiff JANET S, DENMAN

15 DATED: September 28, 2016 Daniel G. Bogden  
16 United States Attorney

17 \*/S/ April A. Alongi

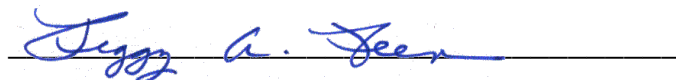
18 \_\_\_\_\_  
April A. Alongi

19 Special Assistant United States Attorney

20 Attorney for Defendant

[\*Via email authorization]

21 IT IS SO ORDERED:

22  
23 

24 UNITED STATES MAGISTRATE JUDGE

25 DATED: \_ September 30, 2016 \_\_\_\_\_